

**HARDWICK COLLIER, LLC**

**BY: VIRGINIA HARDWICK, ESQ. (Attorney I.D. No. 202649)**

**TIFFANIE C. BENFER, ESQ. (Attorney I.D. No. 202096)**

179 North Broad Street

Doylestown, PA. 18901

Attorneys for Plaintiff

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**JULIE DIAZ**

49 E. Saucon Street,  
Hellertown, PA 18055

Plaintiff,

v.

**SAUCON VALLEY MANOR, INC.**

1177 6<sup>th</sup> Street  
Whitehall, PA 18052

and

**NIMITA KAPOORATIYEH**

**A/K/A NEMITA ATIYEH**

**A/K/A NEMO AIYAH**

1177 6<sup>th</sup> Street  
Whitehall, PA 18052

Defendants.

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No. 12-cv-00433

Jury Trial Demanded

**SUPPLEMENTAL VERIFICATION OF VIRGINIA L. HARDWICK  
IN SUPPORT OF PLAINTIFF'S PETITION FOR  
ATTORNEYS' FEES AND COSTS**

I, Virginia L. Hardwick, hereby verify that the following facts are true and correct  
and based on my personal knowledge and belief:

1. I am an attorney licensed to practice law in the Commonwealth of  
Pennsylvania (2006) and the States of New Jersey (1985) and New York (1985).

2. I submit this Supplemental Verification to address a few issues raised in the Opposition to Plaintiff's Petition for Attorneys' Fees and Costs.

3. Attached hereto as Exhibit A is a revised record of time entries to address two points raised by Defendants:

- a. The time entry previously provided inadvertently billed the time for Ms. Benfer at the rate of \$325/hour. That rate had been in our time system. Although we reduced it to \$300/hour for the fee petition, a default feature in our software mistakenly returned the rate to the previously-entered \$325.
- b. The time entry for Ms. Hensinger on July 23, 2013 for attendance at trial has now been "No charged." The failure to make this adjustment earlier was inadvertent.

4. Accordingly, plaintiff revises her previously submitted application for fees as follows: The total sought is \$441,746.63, which includes fees of \$422,046.00 billed by Hardwick Collier; \$3,210.50 billed by Hill Wallack; and costs of \$16,490.13.

5. Defendants incorrectly argue that our firm billed 18 hours for responding to the summary judgment motion between February 11 and February 18, 2013, after the opposition to the summary judgment motion had been filed. This argument demonstrates a mischaracterization of the time records. The time entries for this time period reflect our firm's initial outlining of the pretrial memorandum and trial preparation, since at that point we had a trial date of late March. The occasional mention of the summary judgment papers in these entries simply shows that we were using the

transcript citations that were included in the summary judgment papers as a starting point for compiling the evidence for trial.

6. Defendants complain that the initial fee petition did not categorize each of the detailed time entry by "task." The time records submitted show time charges in detail and therefore allow the Court to evaluate the time billed. Many items do not fit neatly within a category. For example, we spent a great deal of time in communications with opposing counsel about trial dates, adjournment requests and logistical matters.

7. The Defendants claim that they have created an Excel spread sheet with these categorizations, but defendants will not provide that to plaintiff, offering it only for *in camera* review. Plaintiff objects to this procedure because there will be no way to evaluate the accuracy of the defendants' characterizations of our time. However, if the Court would find such an analysis helpful, we are prepared to provide task-by-task categorization to the Court.

The foregoing facts are true to the best of my knowledge and information. I understand that if any of the foregoing statements made by me are willfully false, I am subject to the penalties provided for under 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.

Respectfully submitted,

By: /s/Virginia L. Hardwick, Esquire  
Virginia L. Hardwick, Esquire  
Attorney for Plaintiff

Dated: September 27, 2013

## **EXHIBIT A**

# Hardwick Collier, LLC

Employment Law and Litigation

179 North Broad St.

Doylestown, PA 18901

Phone: (215) 230-1912 | Fax: (215) 230-1913

## Account Statement

Prepared for Julie Diaz

Re: Diaz, Julie v. Saucon Valley Manor, Inc.

Previous Balance	\$0.00
Current Charges	\$438,536.13
New Balance	\$438,536.13
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$438,536.13
Trust Account	\$0.00

# Hardwick Collier, LLC

Employment Law and Litigation

179 North Broad St.

Doylestown, PA 18901

Phone: (215) 230-1912 | Fax: (215) 230-1913

## INVOICE

Julie Diaz  
49 E. Saucon Street  
Hellertown, PA 18055  
United States

Invoice Date: September 26, 2013  
Invoice Number: 10522  
Invoice Amount: \$438,536.18

### Matter: Diaz, Julie v. Saucon Valley Manor, Inc.

#### Attorney's Fees

7/5/2011	Telephone call with J. Diaz about Def. Position Statement	T.C.B.	.30	\$90.00
7/7/2011	letter to EEOC; emailed to Frances Watson	H.C.F.	.40	\$38.00
7/13/2011	Diaz- Drafting Response to Saucon Valley's Position Statment	T.C.B.	.30	\$90.00
7/14/2011	Diaz-Initial Draft Rebuttal Statement; letter to F. Watson regarding request for the right to sue; sent letter out and emailed F. Watson.	T.C.B.	.90	\$270.00
7/14/2011	conf Tiff re strategy on rebuttal	V.L.H.	.30	\$120.00
8/10/2011	reviewed file and discussion with TCB re: facts; right to sue	H.C.F.	.70	\$66.50
8/11/2011	reviewed file and call to EEOC re: status of right to sue	H.C.F.	.40	\$38.00
8/16/2011	Discussed status at Case Review Mtg.	T.C.B.	.20	\$60.00
8/30/2011	reviewed file; discussion with TCB re: S/L	H.C.F.	.30	\$28.50
9/20/2011	Telephone Conversation with client	T.C.B.	.90	\$270.00
9/20/2011	reviewed file/facts/defendant's position statement/ID possible witnesses	T.C.B.	1.30	\$390.00
9/21/2011	memo to file re: telephone conversation with client on 9/20/11	T.C.B.	.40	\$120.00
9/21/2011	Researched contact info on Teresa Zoba	T.C.B.	.20	\$60.00
9/23/2011	drafted fee agreements for transfer of file from HW	H.C.F.	.30	No Charge
11/3/2011	email to Watson at EEOC re: right to sue; email to TCB	H.C.F.	.30	\$28.50
11/11/2011	TC with the client; follow up discussion with JC and HF about clients behavior	T.C.B.	.70	\$210.00
11/11/2011	Contacted client to update her on the right to sue	T.C.B.	.10	\$30.00

11/15/2011	letter to client with copies of all EEOC documents; discussion with TCB	H.C.F.	.70	\$66.50
11/17/2011	discussion with TCB re: complaint and doctor's records	H.C.F.	.30	\$28.50
12/9/2011	Drafting Complaint; Researching ADAAA and Alcoholism; Substantial limit major life activity by alcoholism	T.C.B.	6.70	\$2,010.00
12/12/2011	Researching the three types of ADA claims under the ADAAA; telephone conversation with client; reviewed more facts particularly what happened the day her father died; and the July 16th park incident	T.C.B.	7.40	\$2,220.00
1/4/2012	Drafted letter to client to accompany draft of complaint for her to review and approve	T.C.B.	.20	\$60.00
1/4/2012	discussion with TCB re: complaint and filing; status - records from inpatient	H.C.F.	.40	\$38.00
1/4/2012	Edited Complaint-Final Review before sending it to the client	T.C.B.	.70	\$210.00
1/11/2012	t/call to client re: receipt and review of Complaint	H.C.F.	.10	\$9.50
1/18/2012	Edited the Complaint	T.C.B.	.90	\$270.00
1/18/2012	Research Whitehall Manor Business Status; Reviewing Handbook	T.C.B.	1.00	\$300.00
1/19/2012	Finished Reviewing Company handbook;	T.C.B.	.50	\$150.00
1/20/2012	reviewed federal complaint; revised and completed civil cover sheets for filing	H.C.F.	1.60	\$152.00
1/25/2012	review and edit complaint	J.L.C.	2.30	\$920.00
1/25/2012	Reviewed complaint with JC; discussed other possible claims	T.C.B.	.50	\$150.00
1/25/2012	review complaint; research cases on Rehab Act; corr. w/Lamar re: bringing Rehab cases; research on medicare payments to nursing home	J.L.C.	2.80	\$1,120.00
1/26/2012	Final Edits to Complaint; added an additional count and supporting facts	T.C.B.	3.00	\$900.00
1/26/2012	revised Diaz complaint; completed and copied filing docs; letter to court; scanned and copied to CD	H.C.F.	1.80	\$171.00
1/30/2012	updated Diaz pleadings	H.C.F.	.70	No Charge
2/1/2012	Researched Judge Gene Pratter-Judge assigned to the case	T.C.B.	.50	No Charge
2/1/2012	completed notice of waiver and waivers of service for complaint; letter to OC; sent certified mail	H.C.F.	1.40	\$133.00
2/1/2012	Reviewed letter to counsel to accompany waiver	T.C.B.	.10	\$30.00
2/7/2012	FOIA letter to EEOC	H.C.F.	.40	\$38.00
2/14/2012	Telephone interview with reporter; reviewed addresses in complaint	T.C.B.	.30	No Charge
2/16/2012	Reviewed article about the case in local Easton paper	T.C.B.	.20	No Charge
2/22/2012	review complaint	V.L.H.	.40	No Charge
3/5/2012	t/call with paralegal for OC re: waivers of service and filing; emailed pdf	H.C.F.	.40	No Charge
3/28/2012	t/call with Baker re: Rehabilitation Act Count in Complaint; t/call with TCB	H.C.F.	.40	\$38.00
3/29/2012	research Civil Rules for Amendment; drafted	H.C.F.	2.20	\$209.00

	amended complaint and cert. of service; letter to court with copy of amended complaint; drafted entry of appearance for JLC; discussion with TCB and JLC			
3/29/2012	amend complaint; review revisions w/TB	J.L.C.	2.40	\$960.00
3/30/2012	t/call TCB re: Amended Complaint and entry of appearance	H.C.F.	.20	\$19.00
4/12/2012	Reviewed Defendant's e-filings from today	T.C.B.	.10	\$30.00
4/12/2012	review answer	V.L.H.	.30	\$120.00
4/13/2012	Reviewed Defendants' Answer	T.C.B.	.40	\$120.00
4/16/2012	discussion with TCB re: status and upcoming discovery	H.C.F.	.40	\$38.00
4/25/2012	Reviewed file and drafted 26a disclosure	T.C.B.	1.20	\$360.00
4/27/2012	Discussion with Holly about Criminal Record Search	T.C.B.	.20	\$60.00
5/1/2012	Letter to client updating her on status of case	T.C.B.	.30	\$90.00
5/2/2012	t/call with TCB re: Diaz and Rule 16 conf.	H.C.F.	.20	No Charge
5/2/2012	legal research; reviewed ADA case law and FMLA Statute with regard to in treatment program for alcoholism	T.C.B.	1.50	\$450.00
5/2/2012	Reviewed the Defendants Joint Discovery plan and drafted changes/additions; forwarded to Defense counsel	T.C.B.	1.00	\$300.00
5/3/2012	t/call with TCB re: Diaz rule 16 conf.	H.C.F.	.20	\$19.00
5/4/2012	t/call with TCB re: Diaz discovery plan; t/call to Costello re: discovery plan and emails	H.C.F.	.40	\$38.00
5/4/2012	Reviewed Counsel's questions about my edits to the Discovery plan and responded	T.C.B.	.20	\$60.00
5/7/2012	formatted rule 26(a) disclosures; drafted Rule 16 conference reported and faxed to chambers; emailed Disclosures to OC	H.C.F.	1.00	\$95.00
5/7/2012	Signed Joint Discovery Plan; Reviewed and Signed 26(a) Disclosure; Reviewed and Signed Conf. Report	T.C.B.	.40	No Charge
5/7/2012	Reviewed Defendant's 26(a) Disclosures	T.C.B.	.20	\$60.00
5/8/2012	t/call with client re: financial docs; updated pleadings	H.C.F.	.70	No Charge
5/8/2012	Reviewing clients documents to work on damage calculations; outlining issues to cover at the Rule 16 conf.	T.C.B.	2.50	\$750.00
5/8/2012	Email to J. Baker regarding deficiency with Defendant's 26(a) Disclosure	T.C.B.	.10	\$30.00
5/8/2012	Telephone Conversation with client about lost pay	T.C.B.	.50	\$150.00
5/8/2012	Discussion with VLH about Rule 16 and settlement discussions	T.C.B.	.10	\$30.00
5/8/2012	conf Tiff re settlement strategy	V.L.H.	.10	\$40.00
5/9/2012	discussion with Keane and TCB re: criminal record; t/call with client and pulled driving record; scanned and copied financial documents to server; reviewed financial docs and damages with TCB for Rule 16 conference	H.C.F.	2.40	\$228.00



5/9/2012	Prep for Rule 16 Conf. Research; Damages calculations; reviewed paystubs and w-2 for 2010 through 2012 Criminal Record Research	T.C.B.	4.00	\$1,200.00
5/10/2012	t/call with TCB re: Diaz settlement and Rule 16	H.C.F.	.20	No Charge
5/10/2012	Attended Rule 16 Conf.; travel time	T.C.B.	3.00	\$900.00
5/14/2012	Reviewed the Eastern District's Pilot Project Discovery Outline	T.C.B.	.50	No Charge
5/16/2012	discussion with TCB re: status; scheduling order	H.C.F.	.30	No Charge
5/17/2012	Reviewed Judge Pratter's Scheduling Order	T.C.B.	.20	\$60.00
5/21/2012	Drafting written Discovery	T.C.B.	2.50	\$750.00
5/22/2012	researched amount of federal interrogatories per defendant; discussion with TCB	H.C.F.	.40	\$38.00
5/22/2012	Drafting written Discovery	T.C.B.	4.50	\$1,350.00
5/24/2012	revised and formatted discovery requests; discussion with TCB re: requests	H.C.F.	2.10	No Charge
5/24/2012	Finished first Draft of Written Discovery	T.C.B.	2.50	\$750.00
5/25/2012	revised and reformatted discovery requests; emailed to OC	H.C.F.	1.40	No Charge
5/25/2012	discussion with TCB re: requests for admissions - separate defendant discovery	H.C.F.	.40	\$38.00
5/29/2012	research into alcoholism as disability under ADA, discussion with TCB re: accomodation and employers perception of disability	H.C.F.	1.20	\$114.00
5/29/2012	Research Prima Facia ADAA and FMLA claims to make sure we have all elements covered	T.C.B.	6.00	\$1,800.00
5/30/2012	Research ADA Retaliation Claim	T.C.B.	.70	No Charge
5/31/2012	discussion with TCB re: ADA retaliation claim and research regarding alcoholism as disability	H.C.F.	.40	No Charge
6/1/2012	updated pleadings; discussion with TCB re: research	H.C.F.	.80	No Charge
6/1/2012	discussion with TCB re: medical records from rehab; reviewed file	H.C.F.	.70	\$66.50
6/12/2012	reviewed medical file	H.C.F.	.40	\$38.00
6/13/2012	reviewed discovery requests to determine documents requested	H.C.F.	.60	\$57.00
6/13/2012	discussion with TCB; call to Keystone Center re: records	H.C.F.	.50	\$47.50
6/14/2012	Typing up Interrogatories and Request to Produce to be answered.	H.C.F.	2.00	No Charge
6/14/2012	reviewed Keystone records; left message at Keystone	H.C.F.	.40	\$38.00
6/15/2012	Drafting responses to Defendants' written discovery	T.C.B.	5.00	\$1,500.00
6/21/2012	type interrogatories; organize file - Emily	H.C.F.	1.50	No Charge
6/21/2012	Telephone conversation with client to review written discovery request; drafting responses to Def. written discovery request	T.C.B.	2.50	\$750.00
6/21/2012	letter to Northampton D&A with subpoena; drafted subpoena	H.C.F.	1.20	\$114.00
6/22/2012	Answering written discovery; reviewing responsive documents	T.C.B.	3.00	\$900.00
6/22/2012	interrogatories - Emily	H.C.F.	1.00	No Charge
6/22/2012	discussion with TCB re: medical authorizations;	H.C.F.	.70	\$66.50

	subpoena and email from Northampton County; reviewed file			
6/22/2012	Drafted letter to client about documents I need from her and releases that I need	T.C.B.	.20	\$60.00
6/22/2012	Telephone conversation with Ms. Carr at the North Hampton Drug and Alcohol Program about subpoena	T.C.B.	.30	\$90.00
6/25/2012	Outlining Depositions for Fox and Stroble; Answered Defendant's RTP	T.C.B.	7.00	\$2,100.00
6/25/2012	Reviewed clients documents received in mail today	T.C.B.	.30	\$90.00
6/26/2012	Finished updating outline and notes from telephone conversation with client last week	T.C.B.	1.50	\$450.00
6/26/2012	scanned and bates stamped documents for production; discussion with TCB re: medical records	H.C.F.	1.20	No Charge
6/26/2012	Finished pulling documents for document production	T.C.B.	.50	\$150.00
6/27/2012	Telephone conversation with client - discussed ARD records about inpatient treatment	T.C.B.	.70	\$210.00
6/27/2012	discussion with TCB re: medical authorization and witness	H.C.F.	.40	\$38.00
6/28/2012	discussion with TCB re: medical authorizations	H.C.F.	.20	\$19.00
6/29/2012	revised answers to discovery; letter to client with answers to review; drafted verification	H.C.F.	1.60	\$152.00
6/29/2012	Finished up answers to written discovery to send draft to client; letter to client with instructions about written discovery	T.C.B.	3.00	\$900.00
7/5/2012	discussion with TCB and VLH re: status; document production	H.C.F.	.50	\$47.50
7/6/2012	copy and bates stamp document production	H.C.F.	.70	No Charge
7/9/2012	drafted Stipulation of Protective Order	H.C.F.	4.00	\$380.00
7/10/2012	Letter to Baker regarding overdue written discovery and 26(a) disclosure	T.C.B.	.40	\$120.00
7/11/2012	t/call to Riverside re: records; faxed authorization; formatted letter to Baker and emailed	H.C.F.	.90	No Charge
7/16/2012	t/call with Riverside re: documents; discussion with TCB	H.C.F.	.30	\$28.50
7/17/2012	reviewed medical records from Riverside; made notations for TCB	H.C.F.	.80	\$76.00
7/19/2012	Reviewed client's medical records from outpatient treatment	T.C.B.	.50	\$150.00
7/20/2012	printed doc production and discovery responses; updated pleadings; bindered and reviewed doc production	H.C.F.	1.70	No Charge
7/20/2012	Spoke with client about sending back the signed verification for written discovery responses	T.C.B.	.10	\$30.00
7/20/2012	Email to J. Baker about Stipulation of Confid Agreement	T.C.B.	.10	\$30.00
7/20/2012	Began Reviewing Defendant Written Discovery Responses	T.C.B.	1.50	\$450.00
7/23/2012	email to TCB re: Diaz verification; discussion re: discovery and confidentiality order	H.C.F.	.20	\$19.00

7/24/2012	discussion with TCB re: discovery requests and confidentiality order	H.C.F.	.40	\$38.00
7/25/2012	letter to Baker with discovery responses; scanned and saved responses; bates stamped doc production; emailed all to Baker	H.C.F.	1.50	No Charge
7/25/2012	Redacted employer ID from all written discovery; drafted letter to J. Baker asking for Stipulation of Confidentiality Agreement; Edited Interrogatories responses based on recent conversation with the client	T.C.B.	2.00	\$600.00
8/2/2012	Finished Reviewing Defendants' Written Discovery Responses, Adding Information to time Line according to written discovery; Outlining Supplemental Discovery and Issues to Discuss with J. Diaz	T.C.B.	4.50	\$1,350.00
8/3/2012	Document Review- Outlining questions for Depositions of Defendants; Telephone Conversation with the client	T.C.B.	7.30	\$2,190.00
8/3/2012	discussion with TCB re: Keystone records; affidavits to EEOC and witnesses; t/call to Keystone re: fax confirmation; completed authorization	H.C.F.	.80	\$76.00
8/8/2012	Letter to Baker Outlining Insufficiency in Def. Discovery Responses	T.C.B.	2.50	\$750.00
8/8/2012	formatted letter to Baker	H.C.F.	.30	No Charge
8/8/2012	Created cast of Characters; Updated timeline; Worked on outline of things to cover with client on the 14th	T.C.B.	1.00	\$300.00
8/13/2012	Reviewed what I need to cover with the client Julie tomorrow at our meeting	T.C.B.	.60	\$180.00
8/14/2012	formatted and sent letter to Baker; discussion with TCB re: medical records	H.C.F.	.80	No Charge
8/14/2012	Meeting with client to review Def. Document Production; supplemented timeline and questions for deps	T.C.B.	5.50	\$1,650.00
8/14/2012	Drafted letter to Keystone about missing fax coversheet	T.C.B.	.40	\$120.00
8/15/2012	formatted letter to KeyStone with authorization re: faxed letter to employer; discussion with TCB	H.C.F.	.80	\$76.00
8/22/2012	discussion with TCB re: fax confirmation from Keystone; copied documents; discussed letters to Baker	H.C.F.	.60	\$57.00
8/22/2012	Reviewed letter from Def counsel about discovery request; reviewed documents reference in letter and drafted response.	T.C.B.	.60	\$180.00
8/22/2012	Reviewed document from Keystone we received today; drafted letter to counsel to send with supplemental doc production of fax coversheet	T.C.B.	.40	\$120.00
8/23/2012	letters to Baker with document production and attachment; bates stamped document	H.C.F.	1.10	\$104.50
8/31/2012	formatted and mailed letter to Baker re: depositions; discussion re: discovery responses with TCB	H.C.F.	.60	No Charge

9/14/2012	Email to J.Baker Confirming Deposition Dates	T.C.B.	.20	\$60.00
9/17/2012	drafted dep notices for Hirsch, Fox and Atiyeh with letter to Baker	H.C.F.	1.10	\$104.50
9/24/2012	updated pleadings; discussion re: deps with TCB; got CR	H.C.F.	.90	No Charge
9/27/2012	drafted supplemental RTP, Rogs and cert. of service; emailed all to Baker	H.C.F.	1.40	\$133.00
10/1/2012	updated pleadings	H.C.F.	.70	No Charge
10/3/2012	Review email for J. Baker about dates for Deps; called M. Stroble to try to schedule dep; Called client to confirm the date of her deposition and date to meet to prepare her for deposition	T.C.B.	.30	\$90.00
10/4/2012	updated file	H.C.F.	.40	No Charge
10/11/2012	Email J. Baker about letter sent Aug 23rd letter with discovery questions that he has never responded to	T.C.B.	.20	\$60.00
10/11/2012	Email J. Baker about M. Stroble's deposition on November 7th	T.C.B.	.10	\$30.00
10/11/2012	Spoke with M. Stroble about scheduling her deposition	T.C.B.	.10	\$30.00
10/11/2012	Email to holly to send subpoena to M. Stroble with the updated address	T.C.B.	.10	\$30.00
10/15/2012	drafted subpoena Stroble; call to CR	H.C.F.	.70	\$66.50
10/16/2012	discussion with TCB re: Stroble subpoena; deposition schedule	H.C.F.	.40	\$38.00
10/17/2012	Drafted subpoena for M. Stroble	T.C.B.	.10	\$30.00
10/19/2012	Updated Stroble subpoena; organized file	A.H.	.10	\$9.50
10/22/2012	Dep Prep for C. Fox	T.C.B.	1.30	\$390.00
10/22/2012	discussion with TCB re: Stroble subpoena and upcoming deps	H.C.F.	.30	\$28.50
10/23/2012	revised Stroble subpoena; letter to Stroble; copied Baker	H.C.F.	.60	\$57.00
10/23/2012	Mailed Stroble Subpoena	A.H.	.20	\$19.00
10/24/2012	Outlining Fox Deposition Outline, Pulling documents for Deposition, email to Defense counsel requesting 2009 Handbook we never received, emailed to Defense counsel requesting two more depositions on November 7th, outlining issues to discuss with Julie during our Dep Prep on the 30th.	T.C.B.	6.60	\$1,980.00
10/26/2012	Dep Prep for C. Fox	T.C.B.	5.50	\$1,650.00
11/2/2012	Dep Prep	T.C.B.	4.00	\$1,200.00
11/5/2012	Dep prep with client	T.C.B.	4.00	\$1,200.00
11/5/2012	Dep Prep Fox	T.C.B.	4.00	\$1,200.00
11/5/2012	met with TCB and client; reviewed documents; call to CR	H.C.F.	.60	\$57.00
11/5/2012	Made copies and organized docs for Diaz dep	A.H.	.80	\$76.00
11/6/2012	Dep Prep Outlining	T.C.B.	5.00	\$1,500.00
11/7/2012	Dep Prep Outlining	T.C.B.	1.50	\$450.00
11/7/2012	Deposed Malissa Stroble; travel time to Allentown	T.C.B.	5.50	\$1,650.00
11/7/2012	Text messages to client Initial thoughts regarding Stroble Dep	T.C.B.	.10	\$30.00
11/8/2012	Drafted/prepped email correspondence to opposing	A.H.	.20	\$19.00

	counsel			
11/8/2012	Telephone Conversation with client Debrief on M. Stroble deposition	T.C.B.	.30	\$90.00
11/8/2012	Letter to J. Baker follow up regarding documents Defendants still need to produce	T.C.B.	.20	\$60.00
11/8/2012	Deposition notices for 3 deps we rescheduled for early december	T.C.B.	.20	\$60.00
11/9/2012	typed up atty notes; made copies for upcoming depositions; updated pleadings and correspondence	A.H.	.80	No Charge
11/11/2012	Drafting Supplemental Interrogatories	T.C.B.	4.50	\$1,350.00
11/12/2012	updated pleadings file	H.C.F.	.60	No Charge
11/12/2012	letter to client re: amended dep date	H.C.F.	.40	\$38.00
11/15/2012	discussion with TCB re: follow up with Baker	H.C.F.	.20	\$19.00
11/16/2012	updated pleadings	H.C.F.	.40	No Charge
11/16/2012	letter to Baker re: overdue documents; t/call with Stroble	H.C.F.	.80	\$76.00
11/19/2012	reviewed stipulation for protective order; verified case law	H.C.F.	.70	\$66.50
11/19/2012	Dep Prep with Client for Deposition on November 20th	T.C.B.	2.00	\$600.00
11/19/2012	Dep PRep for C. Fox; Reviewed documents for J. Diaz's Dep tomorrow; Reviewed and edited stipulation and forwarded it to John Baker	T.C.B.	4.40	\$1,320.00
11/19/2012	Copied docs for dep.	A.H.	.20	\$19.00
11/20/2012	Defending Julie's Deposition and travel time	T.C.B.	8.50	\$2,550.00
11/20/2012	t/call with TCB re: protective order; printed order	H.C.F.	.20	\$19.00
11/21/2012	discussion with TCB re: Diaz dep	H.C.F.	.30	\$28.50
11/26/2012	updated pleadings	H.C.F.	.60	No Charge
11/26/2012	filed protective order	H.C.F.	.50	No Charge
11/27/2012	bates stamped and marked confidential docs for production	H.C.F.	.70	\$66.50
12/3/2012	Dep Prep for Hirsh and Nimita	T.C.B.	6.50	\$1,950.00
12/4/2012	Revamped Dep outlines for C. Hirsch and Nimita Kapoor's Depositions	T.C.B.	3.00	\$900.00
12/4/2012	discussion with TCB re: deposition of Fox and documents needed	H.C.F.	.50	\$47.50
12/4/2012	meet with Tiffanie re deposition strategies	V.L.H.	.40	\$160.00
12/4/2012	Dep Prep for C. Fox deposition	T.C.B.	.80	\$240.00
12/4/2012	Fox's Deposition	T.C.B.	3.00	\$900.00
12/4/2012	Strategizing with VLH and JC about Deps on 12-5-12	T.C.B.	.40	\$120.00
12/5/2012	deposition of Carolyn Hirsch	H.C.F.	3.00	No Charge
12/5/2012	Dep Prep and Deps for Hirsch and Nimita Kapoor-Follow-up notes/ strategizing etc	T.C.B.	6.00	\$1,800.00
12/21/2012	organized dep materials & both plain./def. doc production	A.H.	.30	\$28.50
12/26/2012	Summarizing Belcak Deposition in preparation for Trial; started letter to John Baker regarding documents Defendant has not produced	T.C.B.	7.50	\$2,250.00
12/27/2012	Finished Summarizing Cindy Belcak's Deposition; Summarized first half of Hirsch Depositions; Id	T.C.B.	7.00	\$2,100.00



	discrepancies between the two depositions.			
12/27/2012	Email Correspondence with J. Baker about missing notes used to write Cindy Fox's Affidavit for the EEOC	T.C.B.	.20	\$60.00
12/28/2012	t/call with JLC re: SJ Motion; email to TCB	H.C.F.	.40	No Charge
12/28/2012	Finished Summarizing C. Hirsch's Deposition; Created outline for July 2010 based on Dep testimony that identifies who knew what and when about Julie's need for Rehab and going into Rehab ID Dep transcript page and inconsistencies	T.C.B.	8.00	\$2,400.00
12/29/2012	review SJ papers; email Tiff re SJ strategy	V.L.H.	1.00	\$400.00
12/29/2012	Reviewed SJ; Email discussion with VLH strategizing response; Emails discussions with HF about deadline to respond	T.C.B.	1.00	\$300.00
12/31/2012	discussion with TCB re: SJ Motion; drafted Order and Cert.; Formatted Brief and Table of Contents	H.C.F.	1.00	\$95.00
12/31/2012	Summarized JD dep transcript	A.H.	2.50	\$237.50
12/31/2012	dep summary for stroble dep; search for 7/16/10 citation	H.C.F.	3.50	\$332.50
12/31/2012	conf Tiff re SJ strategy	V.L.H.	.20	\$80.00
12/31/2012	Discussion with VLH Strategized response to SJ	T.C.B.	.20	\$60.00
12/31/2012	Summarizing "Nemo's" deposition; identifying inconsistencies in her deposition testimony with Carolyn Hirsch and Cindy Fox Deposition Testimony	T.C.B.	5.50	\$1,650.00
1/1/2013	Drafting Response to Def. SJ	T.C.B.	2.00	\$600.00
1/1/2013	draft language for brief on SJ standard; email Tiff re same	V.L.H.	.40	\$160.00
1/2/2013	Cont'd to summarize JD dep transcript	A.H.	3.00	\$285.00
1/2/2013	t/calls with TCB re: dep summaries and SJ Response	H.C.F.	.30	\$28.50
1/2/2013	finished Stroble dep summary	H.C.F.	3.50	\$332.50
1/2/2013	Outlining SJ response and began drafting response to Def. SJ	T.C.B.	5.50	\$1,650.00
1/3/2013	Drafting Response to Def. SJ	T.C.B.	5.00	\$1,500.00
1/3/2013	cont'd to summarize JD dep transcript; prepared correspondence to J. Pratter	A.H.	.60	\$57.00
1/4/2013	Drafting Response to Def. SJ	T.C.B.	6.00	\$1,800.00
1/4/2013	Finished summary of JD dep transcript; faxed/emailed correspondence to J. Pratter and Baker	A.H.	1.50	\$142.50
1/5/2013	Drafting Response to Def. SJ	T.C.B.	3.50	\$1,050.00
1/6/2013	Drafting Response to Def. SJ	T.C.B.	5.00	\$1,500.00
1/7/2013	discussion with TCB re: Diaz and dep citations	H.C.F.	.40	\$38.00
1/7/2013	Drafting Response to Def. SJ	T.C.B.	9.50	\$2,850.00
1/8/2013	pull summary judgement research; copy and provide to GH and TB	J.L.C.	.60	\$240.00
1/8/2013	Answering Def. SJ	T.C.B.	7.50	\$2,250.00
1/9/2013	Edited cites in brief	A.H.	3.00	\$285.00
1/9/2013	discussion with TCB re: fact section of memo and cites to record	H.C.F.	.50	\$47.50
1/9/2013	Drafting Response to Def. SJ	T.C.B.	7.00	\$2,100.00

1/9/2013	check Pratter rules re SJ motion; email Tiff	V.L.H.	.20	\$80.00
1/10/2013	discuss motion to strike	J.L.C.	.40	No Charge
1/10/2013	revised and faxed letter to Judge Pratter; emailed letter to Baker	H.C.F.	.40	No Charge
1/10/2013	Drafting Response to Def. SJ and Editing SJ Response; Letter to the court requesting clarification as to when Pre-Trial Memo is Due; Reviewed Motion to Dismiss SJ	T.C.B.	9.00	\$2,700.00
1/10/2013	Edited cites in brief; started responses to facts in amended MSJ	A.H.	5.50	\$522.50
1/10/2013	drafted and formatted motion to strike, order, memo, and cert; discussion with TCB and VLH re: motion; filed with court	H.C.F.	1.90	\$180.50
1/10/2013	revised facts section of memo in opposition to SJ into numbered paragraphs; discussion with TCB	H.C.F.	1.20	\$114.00
1/10/2013	conf Tiff and Holly re motion to strike; review motion	V.L.H.	.40	\$160.00
1/11/2013	Worked on responses to facts in Def. amended MSJ	A.H.	5.00	\$475.00
1/11/2013	Editing SJ Response	T.C.B.	7.30	\$2,190.00
1/12/2013	Editing Response to SJ	T.C.B.	1.00	\$300.00
1/13/2013	Editing Response to SJ	T.C.B.	2.00	\$600.00
1/13/2013	review order from court re SJ motion; conf Tiff re strategy	V.L.H.	.50	\$200.00
1/14/2013	Updated pleadings; drafted client correspondence; checked cites in brief	A.H.	3.50	\$332.50
1/14/2013	Edited SJ Response/Added to Last Pretext Arguments	T.C.B.	1.50	\$450.00
1/14/2013	reviewed and revised oppos. to SJ Brief	H.C.F.	3.50	\$332.50
1/15/2013	Answering Def. recitation of facts attached to Amended SJ	T.C.B.	3.20	\$960.00
1/16/2013	reviewed and revised opposition to SJ Motion brief	H.C.F.	2.00	\$190.00
1/16/2013	Finished drafting answer to Defendants recitation of facts; made additions to the SJ Reponse	T.C.B.	6.70	\$2,010.00
1/17/2013	reviewed and revised plaintiff's response to SJ Motion facts	H.C.F.	1.50	\$142.50
1/17/2013	Edited Brief- ADA Argument	T.C.B.	.30	\$90.00
1/20/2013	read defendants' SJ papers and outline response	V.L.H.	1.60	No Charge
1/21/2013	discussion with TCB re: deadline and status of opposition brief to SJ	H.C.F.	.30	\$28.50
1/22/2013	review and edit SJ brief; review SJ record	V.L.H.	5.50	No Charge
1/23/2013	Edit and revise SJ brief; review record	V.L.H.	2.50	No Charge
1/23/2013	draft and revise fact section of SJ brief	V.L.H.	1.30	No Charge
1/24/2013	Review record; draft and revise SJ brief	V.L.H.	6.00	No Charge
1/24/2013	revise SJ brief	V.L.H.	1.60	No Charge
1/24/2013	t/call with Pratter's secretary re: magistrate judge; discussion with TCB	H.C.F.	.30	\$28.50
1/24/2013	Case Law Research FMLA Satisfying notification requirement; employers policy that contradict FMLA DOL regs	T.C.B.	1.50	\$450.00
1/25/2013	reviewed and revised facts section of Oppos. to SJ	H.C.F.	1.20	\$114.00
1/25/2013	Reviewing VLH's Edits to the Brief; began filling in	T.C.B.	4.00	\$1,200.00

	holes in brief			
1/28/2013	revised Order for SJ Motion; revised and formatted table of contents	H.C.F.	1.50	\$142.50
1/28/2013	Edited Brief in response to Def. SJ	T.C.B.	7.00	\$2,100.00
1/29/2013	Editing Brief in Response to SJ; Edited Response to Def Numbered Fact Paragraphs	T.C.B.	5.00	No Charge
1/29/2013	reviewed Oppos. to SJ Brief; revised exhibits, revised table of contents; review facts for exhibits; added cites to brief	H.C.F.	3.50	\$332.50
1/29/2013	edited plaintiff responses to facts in amended MSJ per TB	A.H.	.50	\$47.50
1/29/2013	edit SJ brief	V.L.H.	6.50	\$2,600.00
1/30/2013	pulled and copied exhibits for oppos to SJ Motion; revised exhibits list and table of contents; reviewed brief	H.C.F.	3.00	\$285.00
1/30/2013	edit and finalize summary judgment brief	V.L.H.	6.80	\$2,720.00
1/30/2013	review/revise SJ brief	J.L.C.	2.80	\$1,120.00
1/31/2013	Organized and prepped response to SJ docs for postage to J. Pratter; dropped off at FedEx for binding; emailed VH correspondence to JB	A.H.	.60	\$57.00
1/31/2013	copied dep transcripts for exhibits to oppos. papers for SJ; revised TOC and exhibits; reviewed Memo; filed ECF	H.C.F.	4.50	\$427.50
1/31/2013	review and revise brief	J.L.C.	3.80	\$1,520.00
1/31/2013	Final edits of SJ brief; review and revise TOC; review and edit response to statement of facts; review and revise order and cert of service; review and check exhibits	V.L.H.	5.30	\$2,120.00
2/3/2013	draft memo re trial preparation strategy; review Julie Diaz deposition transcript re damage analysis	V.L.H.	1.60	\$640.00
2/4/2013	Drafting Pre Trial Memo	T.C.B.	4.00	\$1,200.00
2/5/2013	Met with client to discuss current status of the case and what our plans were in the next 8 weeks in preparation for trial	T.C.B.	1.60	\$480.00
2/5/2013	Working on Pre-trial memo	T.C.B.	3.00	\$900.00
2/5/2013	meet with client and TCB re trial prep and strategy	V.L.H.	1.50	\$600.00
2/11/2013	discussion with TCB re: status of pre-trial memo and SJ Motion	H.C.F.	.30	\$28.50
2/11/2013	Pre-Trial Memo/ Outlining Issues to Cover with Louise	T.C.B.	8.00	\$2,400.00
2/12/2013	Pre-Trial Memo- Evidence that we want to exclude; Damage sheet; legal research re Interference Argument; pulling case law to support failure to follow DOL Regs can constitute Interference	T.C.B.	2.00	\$600.00
2/12/2013	Research DOL Regs for FMLA	T.C.B.	.80	\$240.00
2/13/2013	Contacted J. Rice's Chambers about obtaining a date certain, Left message J. Baker; reviewed with VLH J. Rice's schedule	T.C.B.	.30	\$90.00
2/13/2013	letter to client confirming meeting with Louise Lipman on March 3rd	T.C.B.	.20	\$60.00
2/13/2013	Pulling quotes from SJ and compiling them	T.C.B.	.50	\$150.00



2/13/2013	according each witness in preparation for trial conf TCB re strategy and Rice; tel calls John Baker; file memo re Baker	V.L.H.	1.20	\$480.00
2/13/2013	Email to J. Baker about Outstanding Discovery	T.C.B.	.10	\$30.00
2/14/2013	discussion with TCB re: Diaz and status; drafted Consent to magistrate	H.C.F.	1.10	\$104.50
2/19/2013	Discussion with VLH and JC about rescheduling Louise Lipman for late April	T.C.B.	.10	\$30.00
2/19/2013	Called client cancelled meeting with Louise Lipman	T.C.B.	.10	\$30.00
2/19/2013	Telephone conversation with J. Rice's chambers scheduling telephone conf for 2/20/13 to discuss deadlines for trial etc.; called Defendant's counsel to confirm date and time; called Chambers back with date and time.	T.C.B.	.40	\$120.00
2/20/2013	Telephone Conf. with Judge Rice and J.Baker regarding trial schedule	T.C.B.	.20	\$60.00
2/20/2013	Pulling quotes from SJ and all deleted text from SJ to create document for trial	T.C.B.	3.00	\$900.00
2/21/2013	Letter to Client about telephone conf. with J. Rice on 2/20/13	T.C.B.	.20	\$60.00
2/21/2013	Reviewed email from J. Rice's law clerk	T.C.B.	.10	\$30.00
2/21/2013	review Rice procedures and memo re voir dire questions	V.L.H.	.40	\$160.00
2/21/2013	Reviewed Judge Rice's Scheduling Order	T.C.B.	.20	\$60.00
2/21/2013	Reviewed Judge Rice's Rules for Jury Questions/Voir Dire/Jury Instructions	T.C.B.	1.00	\$300.00
2/22/2013	reviewed scheduling order; discussion with TCB; converted Rice orders to pdf	H.C.F.	.80	No Charge
2/22/2013	Email to J. Baker about Outstanding Discovery	T.C.B.	.20	\$60.00
2/26/2013	Reviewed email from J. Baker about suppl. Rog and responded	T.C.B.	.10	\$30.00
2/28/2013	organized file	H.C.F.	.50	No Charge
3/5/2013	updated pleadings	H.C.F.	.50	No Charge
3/6/2013	Reviewed email from Marc Weinstein about his FMLA case against Defendants; looked at Def. answers in our discovery; discussed with VLH and JC recent development	T.C.B.	.80	\$240.00
3/6/2013	Initial Review of Def. Answer to Supplemental Discovery; Check discovery binder for certifications; email to J. Baker asking for verifications.	T.C.B.	.90	\$270.00
3/7/2013	discussion with TCB re: Diaz; reviewed sanctions	H.C.F.	.60	\$57.00
3/7/2013	draft and revise motion to compel; research re Saucon and Whitehall	V.L.H.	2.70	\$1,080.00
3/8/2013	Reviewed letter from J. Baker and Responded via email.	T.C.B.	.20	\$60.00
3/8/2013	conf Tiff re corresp from Baker; emails re possible motion; review and revise motion papers	V.L.H.	.60	\$240.00
3/11/2013	reviewed letter to Judge Rice; revised; copies of exhibits	H.C.F.	.90	\$85.50
3/11/2013	Reviewed the Letter to Judge Rice about	T.C.B.	.40	\$120.00

	Defendant's answer to Interrogatories			
3/11/2013	Research Retaliation Claim- to determine if we will respond to Judge Rice's Order	T.C.B.	.90	\$270.00
3/11/2013	pulled corporate information	H.C.F.	.40	\$38.00
3/11/2013	tel call OC and court; research re corporations; review and revise letter to court; review exhibits	V.L.H.	3.00	\$1,200.00
3/11/2013	finalize letter to judge; email Morrison and Baker	V.L.H.	.60	\$240.00
3/12/2013	Updated pleadings & file	A.H.	.20	No Charge
3/12/2013	Reviewed Def. Response to Letter VLH sent to Judge Rice Yesterday	T.C.B.	.30	\$90.00
3/13/2013	Edited List Of Plaintiff's Documents for Def.; Drafting Motions In Limine	T.C.B.	4.00	\$1,200.00
3/13/2013	Compiled list of exhibits for pre-trial memo	A.H.	.50	\$47.50
3/13/2013	discussion with TCB re: rules for 26(a) and witnesses at trial	H.C.F.	.30	\$28.50
3/14/2013	Researched and Drafted Praeipce to Withdrawl Retaliation Claims	T.C.B.	.50	No Charge
3/14/2013	conf Tiffanie re strategy on trial issues; prepare for telephone conference with Judge Rice; tel call Court	V.L.H.	1.20	\$480.00
3/14/2013	Prep for Telephone Conf. with Judge Rice	T.C.B.	.50	\$150.00
3/14/2013	Telephone Conf. with Judge Rice/VLH and George Morrison	T.C.B.	.20	\$60.00
3/14/2013	Sent G. Morrison email confirming what was agreed upon during telephone conf. with Judge Rice	T.C.B.	.40	\$120.00
3/14/2013	Called client and updated her about Telephone Conf. with Judge Rice	T.C.B.	.20	\$60.00
3/14/2013	Discussion with VLH Pre Conf. call with J. Rice	T.C.B.	.20	\$60.00
3/14/2013	Discussion with VLH after conf call with J. Rice	T.C.B.	.10	\$30.00
3/14/2013	Created list of things that need to be done in the next three weeks in light of Conf. call with J. Rice	T.C.B.	.20	\$60.00
3/14/2013	Telephone Conversation with G. Morrison	T.C.B.	.20	\$60.00
	Discussed Rule 33 -authority that supports my position that Interrogatories have to an sworn affidavit			
3/15/2013	revised and filed praecipe to withdraw claims	H.C.F.	.80	No Charge
3/15/2013	Trial Prep Direct Examinations; looking at docs for ; Contacted Treating Physician	T.C.B.	3.50	\$1,050.00
3/18/2013	updated pleadings	H.C.F.	.50	No Charge
3/20/2013	t/call with Keystone Center re documents; discussion with TCB re: rogs and responses	H.C.F.	.70	\$66.50
3/21/2013	legal research re ADA retaliation claim	V.L.H.	.70	No Charge
3/21/2013	Telephone Conversation with George Morrison about supplemental Doc production on other complaint against Def.	T.C.B.	.20	\$60.00
3/25/2013	legal research and draft brief to Judge Rice re ADA retaliation	V.L.H.	4.30	No Charge
3/25/2013	Email to J. Baker memorializing my telephone conv. with G. Morrison about document production	T.C.B.	.40	\$120.00
3/26/2013	Reviewed letter to Judge Rice and G. Morrison about Retaliation Claim	T.C.B.	.40	No Charge
3/26/2013	draft and finalize letter brief to Court re retaliation	V.L.H.	2.50	No Charge

3/26/2013	claim; tel call to George Morrison re same Email to G. Morrison about Discovery dates for the follow-up depositions	T.C.B.	.20	\$60.00
3/27/2013	Prep for Supplemental Depositions; Reviewing doc from other pending cases against def.; Pulling testimony from Atiyeh's Dep for Trial outline	T.C.B.	6.80	\$2,040.00
3/27/2013	discussion with TCB re: trial prep; scanned documents	H.C.F.	.60	\$57.00
3/28/2013	Conf. with VLH about Discovery Issues	T.C.B.	.80	\$240.00
3/28/2013	Researching and Drafting Jury Instructions	T.C.B.	2.00	\$600.00
3/28/2013	letter to Baker re: 26(a) disclosures	H.C.F.	.40	\$38.00
3/28/2013	conf Tiff re discovery issues; outline trial testimony	V.L.H.	.80	\$320.00
4/1/2013	Telephone Conf. with J. Baker; G. Morrison and VLH about supplemental discovery	T.C.B.	.30	\$90.00
4/1/2013	Follow-up discussion with VLH about conf. with J. Baker and G. Morrison	T.C.B.	.10	\$30.00
4/3/2013	review document production and prepare for Atiyeh deposition	V.L.H.	6.50	\$2,600.00
4/4/2013	preparation for Atiyeh deposition; draft Atiyeh trial examination	V.L.H.	4.50	\$1,800.00
4/4/2013	emails and tel calls John re depositions and trial adjournment; conf Tiff	V.L.H.	.50	\$200.00
4/4/2013	tel call Baker; tel call court re trial adjournment	V.L.H.	.40	\$160.00
4/5/2013	Reviewed J. Baker's email regarding extending trial; letter to judge regarding retaliation claims; discussion with VLH pushing the trial off for 45 days.	T.C.B.	.40	No Charge
4/5/2013	Telephone Conf. with J. Baker about his request to push Trial date back to July 2013	T.C.B.	.20	\$60.00
4/5/2013	Telephone Conf. with Judge Rice, J. Baker, VLA about rescheduling trial date	T.C.B.	.20	\$60.00
4/5/2013	Telephone conversation with George Morrison - he is going to reproduce Defendant's document production with Bate Stamp Nos.	T.C.B.	.10	\$30.00
4/5/2013	discussion with TCB re: scheduling order, etc.	H.C.F.	.40	\$38.00
4/5/2013	Meeting with Marc Weinstein about his case against SV and Strategized about our case	T.C.B.	2.50	\$750.00
4/5/2013	Updated Pleadings & Matter Calendar	A.H.	.30	\$28.50
4/5/2013	meet with Marc Weinstein and TCB	V.L.H.	2.50	\$1,000.00
4/5/2013	prepare for Atiyeh deps	V.L.H.	.60	\$240.00
4/8/2013	t/call to CR for deps; discussion with TCB re: strategy	H.C.F.	.40	\$38.00
4/9/2013	Memo to file re: meeting with Marc. W. on 3/5; added notes to motions in limine and theme of case	T.C.B.	.90	\$270.00
4/9/2013	Telephone conversation with client about recent events- Trial postponed; deps next week	T.C.B.	.30	\$90.00
4/10/2013	Reviewing Suppl Discovery Responses and Document Production	T.C.B.	1.50	\$450.00
4/10/2013	review record; draft cross examination and deposition prep	V.L.H.	3.00	\$1,200.00
4/10/2013	Reviewed Defendant doc production	A.H.	.50	\$47.50

4/12/2013	Telephone conv. with G. Kounoupis and follow-up email to G. Kounoupis regarding Anna O'Tool Matter	T.C.B.	.40	No Charge
4/12/2013	review recently produced documents; prepare for deposition	V.L.H.	1.70	\$680.00
4/12/2013	prepare for Atiyeh and Hirsch deps; Atiyeh cross examination	V.L.H.	2.50	\$1,000.00
4/15/2013	emails re dep schedule; prepare for Atiyeh dep	V.L.H.	1.50	\$600.00
4/15/2013	Compiled documents for Atiyeh Deposition	A.H.	.80	\$76.00
4/16/2013	Travel time to Saucon Valley; Deposition of Nimita Atiyeh and Carolyn Hirsch	T.C.B.	6.80	No Charge
4/16/2013	Updated pleadings and correspondence	A.H.	.20	\$19.00
4/16/2013	prepare for depositions of Atiyeh and Hirsch; travel; take depositions	V.L.H.	7.00	\$2,800.00
4/17/2013	discussion with VLH and TCB re: depositions and amending 26 (a) Disclosures; drafted amendment; redacted W2 form	H.C.F.	1.40	\$133.00
4/17/2013	Researched Atiyeh accountant	A.H.	.20	\$19.00
4/18/2013	bates stamped document; letter to Baker re: supplemental production; organized file	H.C.F.	1.20	\$114.00
4/18/2013	Letter to Defense counsel regard Corp Accountant and revision to Plaintiffs 26(a) disclosures	T.C.B.	.30	\$90.00
4/19/2013	Hirsch trial cross examination	V.L.H.	.40	\$160.00
4/22/2013	Research/Notes for Jury Instructions	A.H.	.40	No Charge
4/22/2013	draft summation	V.L.H.	1.20	\$480.00
4/23/2013	Drafting Pre-trial memo	T.C.B.	1.50	\$450.00
4/24/2013	Drafting Pre-trial memo; Reviewing documents to ID for trial	T.C.B.	4.00	\$1,200.00
4/24/2013	order and review focus group materials	V.L.H.	.50	No Charge
4/24/2013	discussion with TCB re: focus groups and Diaz strategy	H.C.F.	.50	\$47.50
4/25/2013	Drafting Fox's cross examination for Trial	T.C.B.	2.00	\$600.00
4/26/2013	Trial Prep Direct Examination of Cindy Fox; conf VLH re trial themes	T.C.B.	3.50	\$1,050.00
4/26/2013	outline summation; conf Tiff re strategy issues on re-opened discovery	V.L.H.	.80	\$320.00
4/29/2013	legal research re jury instructions	V.L.H.	.70	No Charge
4/29/2013	Reviewing Fox's deposition testimony and drafting Fox's Cross Examination;	T.C.B.	5.00	\$1,500.00
4/29/2013	Reviewed Atiyeh's most recent Deposition Testimony; email to VLH proposing adding another Def. Estate Planning Attorney to 26(a)	T.C.B.	.70	\$210.00
4/29/2013	review Atiyeh deposition transcript	V.L.H.	1.80	\$720.00
4/30/2013	Researching and Drafting Motions In Limine	T.C.B.	5.80	\$1,740.00
4/30/2013	Reviewing Jury Instructions	T.C.B.	.50	\$150.00
4/30/2013	discussion with TCB re: jury instructions and deadlines	H.C.F.	.40	\$38.00
5/2/2013	Drafted motion in limine to exclude DUI and edited motion in limine for the July 16th incident	T.C.B.	3.00	\$900.00
5/12/2013	draft summation	V.L.H.	2.00	\$800.00
5/14/2013	Research to supplement Jury Instructions	T.C.B.	4.80	No Charge

5/14/2013	conf TCB re to do items and focus group	V.L.H.	.20	\$80.00
5/15/2013	Drafting Jury Instructions	T.C.B.	5.50	No Charge
5/15/2013	Focus group research and planning	V.L.H.	2.50	No Charge
5/16/2013	revised jury instructions	H.C.F.	.50	No Charge
5/16/2013	pulled research for trial notebook; drafted research documented; bindered all research	H.C.F.	3.00	\$285.00
5/17/2013	t/calls to northampton county court, Bethlehem police department, etc. for Nydia criminal docket, docket search criminal docket	H.C.F.	1.50	\$142.50
5/20/2013	Reviewing Rules of Evidence; Research for Motions In Limine to Prevent Def. from Arguing Leave of Absence was unreasonable and Diaz was a Direct threat as a Defense	T.C.B.	3.50	\$1,050.00
5/20/2013	discussion with VLH about Diaz witness criminal docket; letter to Criminal Div. Northampton County re: certified copy of docket	H.C.F.	.50	\$47.50
5/20/2013	reviewed, revised and formatted jury instructions	H.C.F.	3.00	\$285.00
5/20/2013	draft summation and examinations; conf Holly re criminal records	V.L.H.	3.80	\$1,520.00
5/21/2013	revised jury instructions	H.C.F.	1.00	No Charge
5/22/2013	revised jury instructions doc 3	H.C.F.	.50	No Charge
5/24/2013	revised motions in limine; drafted orders	H.C.F.	3.50	\$332.50
5/24/2013	Motions In Limine and Research- Affirmative Def. Direct Threat; Edited Pre-Trial Memo	T.C.B.	6.00	\$1,800.00
5/28/2013	Researching and Drafting Proposed Jury Instructions	T.C.B.	6.50	\$1,950.00
5/29/2013	Reviewed documents with VLH for Friday deadline; discussed the certified copy of the court docket and how to use it at trial	T.C.B.	.50	\$150.00
5/29/2013	Drafting FMLA Jury Instructions	T.C.B.	.70	\$210.00
5/30/2013	updated case law in motions in limine; pulled deposition citations	H.C.F.	1.20	\$114.00
5/30/2013	pulled Third Circuit research for "direct threat" and Fed. R. Evid. 403 language	H.C.F.	1.70	\$161.50
5/30/2013	t/call with client; discussion with VLH and email to TCB	H.C.F.	.40	\$38.00
5/30/2013	Trial Prep- Working on Case Themes for Voir Dire and strategy for psychological damages	T.C.B.	2.50	\$750.00
5/30/2013	review and compile documents re trial exhibits	V.L.H.	3.00	\$1,200.00
5/31/2013	Trial prep reviewed exhibits for Trial; Reviewed Defendant's Exhibit List	T.C.B.	4.00	\$1,200.00
5/31/2013	Organized/labeled Plaintiff's trial exhibits; scanned, merged & emailed exhibits to OC; drafted correspondence to OC; organized Def exhibits into binder	A.H.	1.50	\$142.50
5/31/2013	pulled and copied exhibits for trial	H.C.F.	2.00	\$190.00
5/31/2013	trial prep; review and prepare exhibits	V.L.H.	1.40	\$560.00
5/31/2013	review dep transcripts; prepare exhibits for trial	V.L.H.	4.80	\$1,920.00
6/2/2013	review and revise in limine motions	V.L.H.	1.40	\$560.00
6/3/2013	meet to discuss focus group; research on focus group and jury questionnaire EDPA	J.L.C.	1.50	No Charge
6/3/2013	Meeting to Discuss Jury Focus Group	T.C.B.	1.30	No Charge



6/3/2013	Editing Motions In Limine to Specifically Address Documents Identified by Defendants in their List of Trial Exhibits	T.C.B.	6.00	\$1,800.00
6/3/2013	team meeting re focus group plans	V.L.H.	1.20	No Charge
6/3/2013	Firm meeting re: Focus Group	A.H.	1.30	\$123.50
6/3/2013	Drafted focus group flyer	A.H.	.50	\$47.50
6/3/2013	review defendants' exhibits; further trial preparation and outline of testimony; in limine motions	V.L.H.	5.20	\$2,080.00
6/4/2013	Completed Trial Exhibit Binder; created plaintiff doc production index & updated docs; updated correspondence & research files; edited focus group flyer; revised focus group phone script; shipped trial exhibit binder	A.H.	3.30	\$313.50
6/4/2013	Drafted script for callers for Jury Research Project	T.C.B.	.50	No Charge
6/4/2013	Reviewing Def. List of Exhibits and Drafting Plaintiff's statement of facts for Jury Research Project	T.C.B.	3.00	\$900.00
6/4/2013	organized trial research	H.C.F.	.50	\$47.50
6/4/2013	review exhibits; prepare for trial; tel call Amanda Farahany re trial strategy	V.L.H.	8.20	\$3,280.00
6/4/2013	Edited Motion In limine - Added 2005 Handbook	T.C.B.	1.00	\$300.00
6/5/2013	Drafting Opening	T.C.B.	4.00	\$1,200.00
6/5/2013	Reviewed Script for callers for Jury Research Project	T.C.B.	.20	No Charge
6/5/2013	formatted and typed verdict form	H.C.F.	.80	No Charge
6/5/2013	Reserved hotel room & videographer for focus group; screened focus group participant calls & organized caller data	A.H.	1.00	\$95.00
6/5/2013	screening calls for potential focus group members	H.C.F.	.60	\$57.00
6/5/2013	research evidence rules and determine objections for defense exhibits; research Rice trial procedures; tel call Nancy Ezold;	V.L.H.	5.00	\$2,000.00
6/6/2013	conf Ali and Tiffanie re focus group	V.L.H.	.40	No Charge
6/6/2013	Drafting Opening	T.C.B.	2.00	\$600.00
6/6/2013	Met w/ TCB & VLH re focus group participants; called participants to confirm & organized their data; reserved hotel meeting space & videographer for second date; drafted focus group confirmation letter & directions; updated correspondence	A.H.	1.50	\$142.50
6/6/2013	Trial Prep with client - Discussed Economic Impact of Losing her Job	T.C.B.	2.50	\$750.00
6/6/2013	trial prep with Julie	V.L.H.	2.50	\$1,000.00
6/6/2013	strategize, write and revise in limine motions; conferences with Tiffanie re trial strategy	V.L.H.	4.10	\$1,640.00
6/7/2013	reviewed motions in limine; copied exhibits; revised and filed four motions with ECF	H.C.F.	4.00	\$380.00
6/7/2013	Organized deposition transcripts	A.H.	.30	\$28.50
6/7/2013	draft and revise in limine motions	V.L.H.	5.60	\$2,240.00
6/7/2013	Reviewed Motions in Limine & pulled/organized exhibits; updated pleadings	A.H.	1.50	\$142.50
6/7/2013	review defendants' motions in limine; emails Tiff	V.L.H.	.90	\$360.00

	and Holly			
6/8/2013	outline responses to in limine motions	V.L.H.	1.20	\$480.00
6/8/2013	draft summation	V.L.H.	.70	\$280.00
6/10/2013	Drafted Response to Defendants' Motion In Limine to Keep Out Evidence about Ms. Figueroa's Arrest etc.	T.C.B.	7.50	\$2,250.00
6/10/2013	Screened focus group calls; revised & printed focus group flyers; met w/ VLH & TCB re: selection of focus group participants; sent confirmation letters to participants	A.H.	2.10	\$199.50
6/10/2013	printed and saved motions	H.C.F.	.40	\$38.00
6/10/2013	screening calls for potential focus group members	H.C.F.	.50	\$47.50
6/10/2013	draft response to in limine motion re other complaints	V.L.H.	4.60	\$1,840.00
6/11/2013	researched financial records for Saucon Valley; pulled Accurant reports for Saucon Valley and Nimita	H.C.F.	1.40	\$133.00
6/11/2013	review Nimita's dep transcripts for in limine motions; draft cross examination of Nimita	V.L.H.	3.70	\$1,480.00
6/11/2013	reviewed, revised oppos. to motion in limine; drafted order and cert	H.C.F.	1.40	\$133.00
6/11/2013	research into Pa statutory law re: summary offenses and non-traffic violations	H.C.F.	1.00	\$95.00
6/11/2013	Updated pleadings; researched M. Feldman contact info; drafted M. Feldman correspondence; client telephone call	A.H.	.80	\$76.00
6/11/2013	Edited Motion In Limine - Response to Nydia Figueora's Testimony and Newspaper Article	T.C.B.	1.00	\$300.00
6/11/2013	Prep for trial prep with client this week. Outlined issues to cover at our weekly session; Additions to Pre- Trial Memo	T.C.B.	3.00	\$900.00
6/11/2013	Drafted letter to Marc Feldman	T.C.B.	.20	\$60.00
6/11/2013	Left a voicemail message for Julie's Brother	T.C.B.	.10	\$30.00
6/12/2013	Editing Motion in limine to include stipulation argument and comparator case law	T.C.B.	3.50	\$1,050.00
6/12/2013	draft and edit in limine motion response; conf Tiff re motions	V.L.H.	4.70	\$1,880.00
6/12/2013	tel call Julie's brother re possible testimony on emotional distress; memo to file	V.L.H.	.70	\$280.00
6/13/2013	copied exhibits for oppos. to Figueroa motion in limine; revised	H.C.F.	1.70	\$161.50
6/13/2013	Trial Prep with client	T.C.B.	2.00	\$600.00
6/13/2013	Reviewed VLH Notes from her interview with David Hudson	T.C.B.	.10	\$30.00
6/13/2013	Reviewed Motion In limine - Re: Evidence about other employees that went out on FMLA and provided VLH feedback	T.C.B.	.40	\$120.00
6/13/2013	draft and revise responses on in limine motions; conf Ali re to do items for trial prep	V.L.H.	4.30	\$1,720.00
6/13/2013	meet with client and Tiff re trial prep	V.L.H.	1.20	\$480.00
6/14/2013	copied exhibits for opposition briefs to motions in	H.C.F.	3.50	\$332.50

	limine; drafted orders and certs of service; revised and reviewed all; filed electronically with court			
6/14/2013	Editing Motion in limine regarding comparator - other employee arrested	T.C.B.	2.50	\$750.00
6/14/2013	draft and revise response on in limine motions	V.L.H.	5.20	\$2,080.00
6/14/2013	review responses to in limine motions filed by defendants	V.L.H.	.60	\$240.00
6/14/2013	Drafted correspondence to J. Rice; sent copies of Motions in Limine to J. Rice; updated and organized pleadings	A.H.	.60	\$57.00
6/14/2013	Initial Review of Defendants' Responses to Plaintiff's Motions In Limine	T.C.B.	.70	\$210.00
6/17/2013	Drafting Opening and Editing Jury Instructions simultaneously	T.C.B.	4.00	\$1,200.00
6/18/2013	Drafting Opening; discussed with VLH incorporating Regs into C. Hirsch examination and jury instructions	T.C.B.	7.00	\$2,100.00
6/18/2013	meeting re: focus group	H.C.F.	1.00	\$95.00
6/18/2013	Typed up forms for focus group	A.H.	1.50	No Charge
6/18/2013	legal research re jury instructions; draft and revise instructions	V.L.H.	2.60	No Charge
6/18/2013	review defendants' responses on in limine motions and review record re same; draft cross examinations of Atiyeh and Hirsch	V.L.H.	5.20	\$2,080.00
6/19/2013	Typed/Revised forms for focus group	A.H.	.40	No Charge
6/20/2013	Researched rates & booked hotel rooms for trial	A.H.	.30	No Charge
6/20/2013	outline defendants' likely arguments and cross examination points in response	V.L.H.	2.80	\$1,120.00
6/20/2013	Editing Jury Instructions for FMLA Claims; Editing Opening	T.C.B.	7.00	\$2,100.00
6/20/2013	discussion with TCB re: focus group	H.C.F.	.50	No Charge
6/20/2013	Met w/ TCB for practice presentation for jury research project; provided feedback	A.H.	.80	No Charge
6/20/2013	draft and revise verdict sheet and ADA jury instructions	V.L.H.	3.20	No Charge
6/20/2013	prepare for jury focus group	J.L.C.	2.30	\$920.00
6/20/2013	Screened phone calls for potential jury research project participants	A.H.	.20	\$19.00
6/20/2013	meet with Julie and Lorenzo for trial preparation	V.L.H.	1.50	\$600.00
6/21/2013	reviewed jury instructions for focus groups	H.C.F.	.50	No Charge
6/21/2013	write introd and neutral facts for jury focus group	J.L.C.	2.70	\$1,080.00
6/21/2013	drafted and filed ECF - Plaintiff's Pretrial Disclosures	H.C.F.	1.20	\$114.00
6/21/2013	meeting re: focus group preparation	H.C.F.	.50	\$47.50
6/21/2013	Trial Prep	T.C.B.	10.00	\$3,000.00
6/21/2013	Trial preparation -- evaluate and outline defendants' likely arguments; review documents	V.L.H.	10.50	\$4,200.00
6/22/2013	Jury research group	H.C.F.	4.50	\$427.50
6/22/2013	Jury Focus Group	T.C.B.	4.50	\$1,350.00
6/22/2013	Jury Research Group	A.H.	4.50	\$427.50
6/22/2013	Attend and present defendants' case for jury research	V.L.H.	6.20	\$2,480.00



	group; review DVD's of presentations and deliberations; notes re changes			
6/22/2013	Jury focus group	J.L.C.	4.50	\$1,800.00
6/24/2013	Trial Prep - reviewed intake docs and reviewed comments about opening	T.C.B.	4.50	\$1,350.00
6/24/2013	Prepared materials for next jury research group; updated participant list; organized materials from completed session; provided feedback on responses from last session	A.H.	1.80	\$171.00
6/24/2013	conf Tiff re trial strategy	V.L.H.	.40	\$160.00
6/24/2013	revise Atiyeh cross	V.L.H.	.40	\$160.00
6/25/2013	Reviewed/revised TCB's presentation for jury research group	A.H.	1.30	No Charge
6/25/2013	copied and scanned orders; focus group prep	H.C.F.	.30	No Charge
6/25/2013	Compiled/merged defendant trial exhibits for TCB	A.H.	.20	\$19.00
6/25/2013	Drafted Memo for Trial Consultant	T.C.B.	2.50	\$750.00
6/25/2013	review court decision on motions in limine; draft and revise proposed stipulations	V.L.H.	1.30	\$520.00
6/25/2013	Reviewed Stipulations with VLH to submit to Def. Counsel	T.C.B.	1.10	\$330.00
6/25/2013	Trial Prep - Editing Pre- Trial Memo- Testimony for Witnesses ID, editing Fact Pattern; Opening comparing facts in opening to proposed stipulations	T.C.B.	5.00	\$1,500.00
6/25/2013	trial preparation -- review depositions for cross examinations, revise proposed stipulations; meet with Tiff re trial strategy	V.L.H.	3.10	\$1,240.00
6/26/2013	discussion with TCB re: focus group and Figueroa issues; revised presentation	H.C.F.	.60	No Charge
6/26/2013	Researched/reviewed trial subpoena form & related federal rules	A.H.	.30	\$28.50
6/26/2013	trial preparation; draft stipulations; email to John Baker	V.L.H.	7.50	\$3,000.00
6/26/2013	Trial Prep: Drafting Jury Instructions; Email to J. Baker about trial Subpeonas Drafting Prep for Diaz to prep for Direct Examination	T.C.B.	8.00	\$2,400.00
6/27/2013	jury focus group	J.L.C.	5.20	\$2,080.00
6/27/2013	updated pleadings	H.C.F.	.60	No Charge
6/27/2013	Met with TCB to review presentation for jury research group	A.H.	1.00	No Charge
6/27/2013	Jury research group	H.C.F.	5.50	\$522.50
6/27/2013	Trial Prep: Drafting Jury Instructions; Trial Memo and Editing Opening	T.C.B.	6.50	\$1,950.00
6/27/2013	Jury focus group prep and presentation	V.L.H.	5.20	\$2,080.00
6/27/2013	meet with client to review focus group results and prepare for trial	V.L.H.	1.60	\$640.00
6/27/2013	Jury Research Group	A.H.	5.00	\$475.00
6/27/2013	confirmation calls to jury research group participants; prepared questionnaires/forms for group	A.H.	.60	\$57.00
6/27/2013	Jury Focus Group	T.C.B.	4.50	\$1,350.00
6/27/2013	Met with Client to Prep for Trial - Reviewed focus	T.C.B.	1.30	\$390.00

	group with her			
6/27/2013	trial prep; Nimita cross; review exhibits	V.L.H.	4.50	\$1,800.00
6/28/2013	Trial Prep Pre-Trial Memo Edits and Case Law Binder	T.C.B.	6.50	\$1,950.00
6/28/2013	reviewed first focus group video	H.C.F.	.70	No Charge
6/28/2013	review videotaped deliberations and focus group results	V.L.H.	2.50	No Charge
6/28/2013	discussion with TCB and VLH re: financials of Saucon; research into financial info	H.C.F.	.70	\$66.50
7/1/2013	Trial Prep with Julie, VLH and Trial Consultant	T.C.B.	9.00	\$2,700.00
7/1/2013	Meet with Julie, TCB and Louise for trial prep	V.L.H.	9.00	No Charge
7/1/2013	prepare client for trial	J.L.C.	8.20	No Charge
7/1/2013	Prepared trial exhibit PDF	A.H.	.60	\$57.00
7/2/2013	Trial preparation; draft and revise pretrial memorandum and jury instructions; conferences with Tiff re strategy; legal research re evidentiary objections and jury instructions; numerous emails Tiff and John Baker	V.L.H.	10.50	\$4,200.00
7/2/2013	research and citations for pretrial memo; discussion with TCB re: instructions; organized rebuttal docs; discussion with TCB re: Saucon rates; discussion with TCB re: trial subpoenas	H.C.F.	1.50	No Charge
7/2/2013	Trial Prep Editing and Drafting Jury Instructions; Research ADAAA for Jury Instructions	T.C.B.	8.50	\$2,550.00
7/3/2013	Trial Prep Editing Jury Instructions and Verdict Sheet	T.C.B.	8.00	No Charge
7/3/2013	Researched defendants on issues of ownership and value of Saucon Valley	A.H.	1.50	\$142.50
7/3/2013	revised and formatted jury instructions; revised and formatted pretrial memo and added stipulations; reviewed and revised verdict form; formatted letter to Rice and faxed	H.C.F.	5.00	No Charge
7/3/2013	Trial preparation; revise and finalize pretrial memorandum; revise jury instructions; tel call John Baker; revise verdict sheet	V.L.H.	9.40	\$3,760.00
7/5/2013	telephone calls Alan Fellheimer; emails Fellheimer; pull documents requested by Fellheimer and email; emails Tiffanie and tel call Julie re settlement offer	V.L.H.	1.30	\$520.00
7/5/2013	review defendants' pre-trial memorandum; tel call TCB re strategy; legal research; trial preparation	V.L.H.	2.40	\$960.00
7/6/2013	trial preparation; draft Atiyeh cross; revise verdict sheet; tel call David	V.L.H.	3.80	\$1,520.00
7/7/2013	draft summation	V.L.H.	1.20	\$480.00
7/8/2013	finalize jury instructions	V.L.H.	1.80	\$720.00
7/8/2013	revised jury instructions; formatted one document for jury instructions; formatted verdict form and proposed statement of facts for voir dire; reviewed all and filed with the Court	H.C.F.	2.70	No Charge
7/8/2013	Correspondence to trial witnesses	A.H.	.30	\$28.50
7/8/2013	Organized trial research	A.H.	.80	\$76.00
7/8/2013	conf Tiff re Fellheimer phone call and strategy; draft	V.L.H.	1.30	\$520.00

	talking points re adjournment request; tel call court adjournment request			
7/8/2013	draft Nimita cross examination	V.L.H.	3.30	\$1,320.00
7/8/2013	Reviewing/Editing Jury Instructions and Verdict Form	T.C.B.	2.50	\$750.00
7/8/2013	Drafting Julie and Nydia's Direct Examination	T.C.B.	4.00	\$1,200.00
7/9/2013	Trial Prep - Met with Julie and VLH to go through her direct	T.C.B.	3.50	\$1,050.00
7/9/2013	Drafting Cindy Fox's Direct Examination	T.C.B.	2.30	\$690.00
7/9/2013	formatted and filed supplemental jury instructions to include in limine instructions	H.C.F.	.80	No Charge
7/9/2013	letter to Judge Rice re: supplemental jury instructions; faxed to Court	H.C.F.	.40	No Charge
7/9/2013	research on jury questionnaire; report to VH & TB; review notes from consultation	J.L.C.	.90	No Charge
7/9/2013	draft Nimita cross examination	V.L.H.	2.30	\$920.00
7/9/2013	meet with Tiff and Julie to prepare trial testimony	V.L.H.	3.50	\$1,400.00
7/9/2013	trial preparation; review documents for Nimita examination	V.L.H.	.80	\$320.00
7/9/2013	letter to court and supplemental jury instructions	V.L.H.	.60	\$240.00
7/9/2013	Editing Outline for Julie's Direct Examination	T.C.B.	1.50	\$450.00
7/10/2013	Created seating chart for jury selection	A.H.	.20	No Charge
7/10/2013	revised subpoena and letter to serve via certified mail to Stroble; copy to Fellheimer; emailed copy of Minnich subpoena to Fellheimer	H.C.F.	.60	\$57.00
7/10/2013	reviewed FMLA policies from 2005 and 2009 with TCB	H.C.F.	.50	\$47.50
7/10/2013	reviewed case law index; compared to jury instructions; pulled case law from jury instructions for binder	H.C.F.	1.00	\$95.00
7/10/2013	Organized research binder	A.H.	1.30	\$123.50
7/10/2013	trial preparation; Atiyeh cross examination; telephone call Alan Fellheimer; review defendants' document production; draft voir dire	V.L.H.	9.20	\$3,680.00
7/10/2013	Edited Voir Dire and sent it Def. Counsel; Drafting C. Fox's Direct Examination	T.C.B.	9.00	\$2,700.00
7/11/2013	cross exam; trial prep	J.L.C.	2.20	No Charge
7/11/2013	firm meeting: review Atiyeh cross	H.C.F.	2.00	No Charge
7/11/2013	download program to run exhibits for trial and convert to readable text	H.C.F.	.50	No Charge
7/11/2013	Firm meeting re: Atiyeh cross exam	A.H.	2.00	No Charge
7/11/2013	Trial Prep worked with VLH on her Direct of Aityeh; Worked on outline of Fox' Direct	T.C.B.	8.00	\$2,400.00
7/11/2013	drafted motion to strike proposed jury instruction 16; filed with Court	H.C.F.	1.00	\$95.00
7/11/2013	Organized Defendants' Updated Trial Exhibits	A.H.	1.80	\$171.00
7/11/2013	draft Atiyeh cross exam; dry run of cross with Tiff, Joyce, Holly and Ali	V.L.H.	5.50	\$2,200.00
7/11/2013	conf Tiff re strategy	V.L.H.	.40	\$160.00
7/11/2013	file organization in preparation for trial	V.L.H.	2.10	\$840.00
7/11/2013	revise Atiyeh cross	V.L.H.	1.30	\$520.00

7/12/2013	set up technology for trial with Court IT personnel	H.C.F.	2.00	\$190.00
7/12/2013	revised amended pretrial order and document production; discussion with TCB and VLH re: time sheets and call offs	H.C.F.	.50	No Charge
7/12/2013	travel to Philadelphia for tech set up in courtroom; conf with Tiff re strategy on exhibits	V.L.H.	4.00	No Charge
7/12/2013	revised trial exhibits; downloaded to laptop for trial	H.C.F.	.80	\$76.00
7/12/2013	Updated trial research binder	A.H.	.60	\$57.00
7/12/2013	Assembled trial exhibits for Atiyeh	A.H.	.70	\$66.50
7/12/2013	draft Nimita cross; tel call David Hudson; draft Hudson direct; tel calls Alan re discovery issues; review defendants' newly produced documents; review defendants supplemental pretrial memo; conf Tiff re strategy on new documents and witnesses	V.L.H.	6.60	\$2,640.00
7/13/2013	Trial Prep -Fox's Direct Examination; Stroble's Direct Examintion	T.C.B.	4.00	\$1,200.00
7/13/2013	trial preparation; review newly produced documents; emails Tiff; draft David's direct	V.L.H.	5.10	\$2,040.00
7/14/2013	compared Def. jury instructions with ours; trial prep - reviewed Atiyeh Cross and TCB opening	H.C.F.	4.50	No Charge
7/14/2013	Trial Prep - reviewed documents produced and Def. amended Pre trial memo; Prep of Atieyh's cross and Opening	T.C.B.	6.00	\$1,800.00
7/14/2013	trial preparation; rehearse Atiyeh cross and direct examination; revise Atiyeh cross; review defendants' proposed jury instructions; review defendants' proposed verdict sheet	V.L.H.	6.80	\$2,720.00
7/15/2013	Trial Prep - reviewed def. proposed verdict sheet and made comments on what we need to object to; Discussed with VLH what we address at pre-trial conf. tomorrow; Met with client to prep; worked on opening	T.C.B.	10.00	\$3,000.00
7/15/2013	assist w/opening; write damage piece for closing	J.L.C.	.90	No Charge
7/15/2013	Created trial exhibit status chart; copied & organized exhibits for Atiyeh cross-exam, updated exhibits in cross-exam outline	A.H.	1.20	\$114.00
7/15/2013	updated exhibits on trial laptop; reviewed exhibits	H.C.F.	1.10	\$104.50
7/15/2013	revised and formatted joint voir dire; filed with Court via ECF	H.C.F.	1.50	No Charge
7/15/2013	research FRCP 26(a)(3) and 37 for TCB regarding late disclosures and ability to produce at trial	H.C.F.	1.60	\$152.00
7/15/2013	created spreadsheet re: Julie's work schedule, assigned hours vs. actual hours worked	A.H.	1.50	\$142.50
7/15/2013	Trial preparation: review opening with Tiff; meet with Julie Diaz to prepare her to testify; review personnel records for discrepancies; emails to Fellheimer re late document production; legal research re subpoena of accountant; meet with TCB to prepare for pretrial conference; review verdict sheet in preparation for pretrial conference	V.L.H.	9.70	\$3,880.00
7/16/2013	pulled research for pretrial conference call;	H.C.F.	.50	No Charge

	discussion with TCB and VLH			
7/16/2013	updated Diaz pleadings binder for trial; updated Diaz trial binder for TCB	H.C.F.	1.50	No Charge
7/16/2013	worked on Fox Cross with TCB	H.C.F.	1.50	No Charge
7/16/2013	reviewed Atiyeh dep transcript for discussion of schedules search	H.C.F.	.40	\$38.00
7/16/2013	Trial Prep Fox Direct; reviewing def. suppl doc production in the last two days; drafting Fox's Direct; pre-trial conf./prep for pre-trial conf	T.C.B.	9.50	\$2,850.00
7/16/2013	Trial prep: prepare for and participate in pretrial conference; prepare examinations; telephone calls and emails with Alan;	V.L.H.	11.50	\$4,600.00
7/17/2013	formatted letter to Judge Rice re: personnel records of added witnesses; faxed to Court and emailed to Fellheimer	H.C.F.	.60	No Charge
7/17/2013	revise jury instructions;review Fellheimer letter; research case law on retaliation and standards for notice	J.L.C.	4.50	No Charge
7/17/2013	printed research for JLC re: 29 CFR 825.301	H.C.F.	.50	No Charge
7/17/2013	trial prep - run through of TCB's opening	H.C.F.	.50	No Charge
7/17/2013	formatted and revised letter to court re: Federal regulations; research into interference claim and 29 CFR 825.300	H.C.F.	1.50	No Charge
7/17/2013	drafted subpoena for Nydia Figueroa; letter with subpoena; emailed to Fellheimer and sent via Fed Ex	H.C.F.	1.00	\$95.00
7/17/2013	reviewed case law for "appropriate notice" for FMLA and 29 CFR 825.302	H.C.F.	.50	\$47.50
7/17/2013	Trial Prep- Stroble Direct/Fox's Direct/ reviewing def. suppl doc production	T.C.B.	9.70	\$2,910.00
7/17/2013	Trial preparation: Atiyeh cross; review opening and Fox cross with Tiffanie; review new documents produced by defendants; letter to court; emails and phone call Alan	V.L.H.	11.70	\$4,680.00
7/18/2013	update trial binder for trial; update and organize case law binder for trial; reviewed trial opening with TCB; organized correspondence and updated for trial; packed up all documents, supplies for trial	H.C.F.	7.50	\$712.50
7/18/2013	Trial Prep: organizing & compiling exhibits, updating indexes, reviewing opening & witness questions with firm, communicating with courthouse; packing for trial	A.H.	6.00	\$570.00
7/18/2013	Trial preparation: letter to Judge Rice re jury instructions; revise Atiyeh cross; emails Allen; review certified financials; conf with Bill Ray re financial issues; conf with Tiff re Fox cross and opening; review revisions to jury instructions	V.L.H.	10.90	\$4,360.00
7/18/2013	Trial Prep- Editing Outlines for Examinations; adding dep cites for impeachment; Working on Opening	T.C.B.	9.50	\$2,850.00
7/19/2013	Trial	A.H.	11.00	No Charge
7/19/2013	travel to and from federal court for first day of trial;	H.C.F.	11.50	\$1,092.50



	attend first day; review opening with TCB; pull exhibits during trial testimony			
7/19/2013	Trial Prep, Trial, Travel Time	T.C.B.	10.00	\$3,000.00
7/19/2013	Trial; travel and prep	V.L.H.	11.00	\$4,400.00
7/20/2013	Trial Prep- reworking Fox Direct Outline	T.C.B.	3.00	\$900.00
7/20/2013	trial preparation	V.L.H.	7.00	\$2,800.00
7/21/2013	assist with jury instructions and trial prep	J.L.C.	3.20	No Charge
7/21/2013	Trial preparation	V.L.H.	11.20	\$4,480.00
7/21/2013	pulled exhibits; organized documents; review of Fox Cross with TCB	H.C.F.	4.00	\$380.00
7/21/2013	Trial prep: copying/organizing exhibits; updating indexes; packing	A.H.	5.50	\$522.50
7/21/2013	Trial Prep	T.C.B.	6.00	\$1,800.00
7/22/2013	assist with trial; bring documents to court, set up file room at courthouse, organize case material	J.L.C.	8.10	No Charge
7/22/2013	Trial- Day 2; Including Travel: Prep for Trial the Next Day	T.C.B.	11.50	\$3,450.00
7/22/2013	Trial	A.H.	12.75	No Charge
7/22/2013	Trial and preparation for next day	V.L.H.	11.00	\$4,400.00
7/22/2013	prep for trial; attend trial day 2 and pull exhibits; prep for next day	H.C.F.	9.00	\$855.00
7/23/2013	Trial	A.H.	11.00	No Charge
7/23/2013	assist with trial; review all transcripts and jury instructions	J.L.C.	8.10	No Charge
7/23/2013	Trial and preparation for next day; draft summation	V.L.H.	11.70	\$4,680.00
7/23/2013	prep for trial; attend trial day 3, pull exhibits during trial	H.C.F.	10.00	\$950.00
7/23/2013	Trial - Day 3; Including travel time	T.C.B.	11.00	\$3,300.00
7/23/2013	Reviewed Changes to Jury Instructions Judge Rice Provided this evening	T.C.B.	.40	\$120.00
7/24/2013	Trial, including travel--assisting attorneys with documents; taking notes; keeping track of exhibits used.	A.H.	10.75	No Charge
7/24/2013	assist with stipulations and jury instructions; assist with trial	J.L.C.	4.30	No Charge
7/24/2013	Trial Day 4: Prep for the Next Day	T.C.B.	12.50	\$3,750.00
7/24/2013	prep for Nimita cross; half day of trial and follow up with client and office	V.L.H.	4.80	\$1,920.00
7/24/2013	run through VLH's closing for trial	H.C.F.	1.50	\$142.50
7/24/2013	trial prep - research for agency third circuit jury instruction; attend trial and pull exhibits	H.C.F.	5.00	\$475.00
7/24/2013	reviewed deposition excerpts for inclusion to jury; email to OC with exhibit corrections	H.C.F.	3.00	\$285.00
7/25/2013	Trial	A.H.	8.50	No Charge
7/25/2013	Trial -Day 5	T.C.B.	10.50	\$3,150.00
7/25/2013	Trial - day 5; pulled exhibits for closing	H.C.F.	8.50	\$807.50
7/25/2013	Trial; preparation for trial; last day trial	V.L.H.	11.80	\$4,720.00
7/26/2013	review judgment; legal research re pretrial interest and liquidated damages	V.L.H.	1.20	\$480.00
7/29/2013	return trial materials to office; unpack	J.L.C.	1.20	No Charge
7/29/2013	letter to court; letter from Fellheimer	V.L.H.	.40	\$160.00

7/30/2013	read fee petition research; calculate time to file	J.L.C.	1.40	No Charge
7/30/2013	review federal rules re time for post trial motions; email and tel call OC re same; letters to Court re timing issues	V.L.H.	1.60	\$640.00
7/30/2013	legal research; draft post trial motion re prejudgment interest and liquidated damages	V.L.H.	3.50	\$1,400.00
7/30/2013	conf Tiff re fee petition; email Scott Pollins re fee affidavit	V.L.H.	.20	\$80.00
7/31/2013	Reviewed correspondence over the past 3 years with Defense Counsel; Drafted portion of the fee petition about pre-trial settlement discussions; EEOC and Discovery	T.C.B.	4.00	\$1,200.00
8/1/2013	reviewed fees and updated to include deposition and other expenses	H.C.F.	.50	\$47.50
8/4/2013	review firm billings for fee petition and adjust to "no charge" items	V.L.H.	1.40	\$560.00
8/4/2013	letter to Fellheimer re settlement proposal	V.L.H.	.60	\$240.00
8/5/2013	legal research and draft brief re ADA retaliation claims	V.L.H.	1.60	No Charge
8/5/2013	revise letter to Fellheimer re proposed settlement	V.L.H.	.30	\$120.00
8/6/2013	legal research and draft brief re ADA and PHRA retaliation claims	V.L.H.	4.30	No Charge
8/6/2013	emails to/from Alan re settlement proposals and fees; conf Tiff re response on fees	V.L.H.	.50	\$200.00
8/7/2013	draft post-trial brief on ADA, PHRA and liquidated damages	V.L.H.	1.40	No Charge
8/7/2013	legal research re federal and state prejudgment interest; draft brief point re same; calculate interest	V.L.H.	2.50	\$1,000.00
8/7/2013	revise brief; email TCB re same	V.L.H.	.40	\$160.00
8/8/2013	review transcript to add citations to brief; review and finalize brief	V.L.H.	2.50	\$1,000.00
8/28/2013	review court's decision	V.L.H.	.30	\$120.00
8/28/2013	draft verification in support of fee petition	V.L.H.	2.80	\$1,120.00
9/5/2013	draft verification for fee petition	V.L.H.	4.30	\$1,720.00
9/5/2013	draft and revise verification	V.L.H.	2.60	\$1,040.00
9/6/2013	email Scott Pollins; compile documents for Scott's review for fee petition	V.L.H.	.50	\$200.00
9/6/2013	revise fee petition	J.L.C.	1.40	\$560.00
9/8/2013	revise VH verification; email Pollins re verification	V.L.H.	1.40	\$560.00
9/8/2013	draft verification and brief for fee petition	V.L.H.	1.20	\$480.00
9/9/2013	legal research; draft brief in support of fee petition	V.L.H.	5.40	\$2,160.00
9/9/2013	emails Matos and Pollins re changes to verifications for fee petition	V.L.H.	.70	\$280.00
9/9/2013	draft and revise brief in support of fee petition	V.L.H.	1.60	\$640.00
9/10/2013	draft brief in support of fee petition; revise verification; legal research; emails Carmen Matos	V.L.H.	4.30	\$1,720.00
9/10/2013	draft and edit fee petition brief	V.L.H.	3.80	\$1,520.00
9/11/2013	revise verification and brief for fee petition	V.L.H.	2.60	\$1,040.00
9/11/2013	Created spreadsheet for fee petition; compiled exhibits; copied, collated, and scanned brief & related documents in preparation for submission	A.H.	2.00	\$190.00

9/11/2013	reviewed and revised verification of VLH for fee petition and brief in support of fee petition; cite checked brief; drafted cover and table of contents	H.C.F.	3.50	\$332.50
9/11/2013	Edited the section about my background in the Verification; Reviewed Hill Wallack's Fees and determined what entries should be marked no charge; Added Hill Wallack's fees and cost to Verification	T.C.B.	.80	\$240.00
9/11/2013	Reviewed/Edited Fee Petition Brief	T.C.B.	.80	\$240.00
SUBTOTAL:			1,715.00	\$422,046.00

**Costs**

12/12/2011	pacer fee for research retrieval			\$2.40
1/26/2012	Federal court filing fee for complaint			\$350.00
2/2/2012	certified mail fee for waivers of service of summons to OC			\$7.40
4/26/2012	fee for PA criminal record check			\$10.00
5/10/2012	parking fee for Rule 16 conference			\$11.00
5/10/2012	mileage to and from Rule 16 conference; 28 miles @ .55/mile - \$15.40			\$15.40
6/21/2012	certified mail fee for service of subpoena to Northampton D&A			\$5.75
6/25/2012	first class postage and return postage for medical authorizations to client			\$2.80
10/23/2012	deposition attendance fee and mileage for Stroble			\$47.22
10/23/2012	Certified Mail Postage: Stroble Subpoena			\$5.75
11/20/2012	deposition transcript fee for Stroble dep			\$386.75
12/21/2012	deposition transcript fees for Fox, Hirsch and Nimita			\$917.75
1/21/2013	fee for deposition transcript of Julie Diaz			\$664.15
1/31/2013	Lg. Envelope for J. Pratter's copies of reply to MSJ			\$2.59
2/1/2013	Postage to J. Pratter			\$8.85
3/11/2013	Postage - Letter & Exhibits to J. Rice			\$5.60
4/12/2013	quarterly pacer research fee			\$21.60
4/16/2013	VLH & TCB Meal (Follow up Depositions of Atiyeh & Hirsch)			\$10.39
5/28/2013	fee for deposition transcripts of Hirsch and Kappor-Atiyeh taken on 4/16/13			\$521.25
5/31/2013	Printed 1 complete copy of Defendants' Trial Exhibits - 260 pages at .11/pg.			\$28.60
6/4/2013	Trial Exhibit Binder & Tabs			\$23.57
6/4/2013	Priority Mail Postage for Trial Exhibits to OC			\$12.35
6/4/2013	Copy of Plaintiff's trial exhibits for Defendants - 361 pages @ .11/pg			\$39.71
6/10/2013	Postage: Focus Group Confirmation Letters			\$7.82
6/14/2013	Priority Mail Postage to J. Rice			\$7.45
6/17/2013	Bar Association room rental fee for trial prep on 7/1			\$50.00
6/21/2013	Cash Payment for Jury Research Project Participants (6/22)			\$480.00
6/21/2013	Staples: Stationery Supplies for Jury Research Project			\$34.96
6/21/2013	Dollar Tree: Food Serving Supplies for Jury Research Project			\$8.48
6/22/2013	Days Inn Conference Room Rental for Jury Focus Group			\$209.00
6/22/2013	Giant: Food/Beverage for Jury Research Project			\$53.89
6/22/2013	George's: Food for Jury Research Project			\$9.16
6/27/2013	Food and beverages for Jury research group			\$119.75
6/27/2013	Payment: Jury Research Group Participants			\$600.00
6/28/2013	rental fee for Days Inn Conference Rooms for focus group			\$221.50
7/1/2013	Trial Consultation with Louise Lipman LCSW-R, TEP CGP			\$1,531.00



7/2/2013	Legal Media: Videographer for Jury Research Group	\$700.00
7/8/2013	Postage: Priority Mail - Proposed Jury Instructions & Verdict Sheet to J. Rice	\$5.60
7/9/2013	quarterly pacer fee for research	\$2.50
7/9/2013	Attendance and mileage fee for Stroble subpoena	\$107.80
7/9/2013	Attendance and mileage fee for Minnich subpoena	\$116.84
7/10/2013	Postage: Certified Mail - Trial Subpoena to Malissa Stroble	\$6.77
7/11/2013	fee for service of subpoena on William Minnich, Jr.	\$196.05
7/12/2013	TCB - Parking @ courthouse for tech set up	\$11.50
7/12/2013	VLH Parking: Technology Set Up w/ Court	\$16.00
7/12/2013	VLH Travel: 70 miles round trip @ .55/mi to courthouse	\$38.50
7/12/2013	TCB Travel: 36 miles roundtrip @ .55/mi to courthouse	\$19.80
7/12/2013	2 Complete Copies of Plaintiff's Exhibits for Judge Rice - 976 pages @ .11/pg	\$107.36
7/12/2013	Staples: Binders for trial materials & numbered exhibit dividers	\$52.66
7/16/2013	Printed New Defendant Document Production - 247 pages @ .11/page	\$27.17
7/17/2013	Fed Ex fee for overnight delivery of subpoena to Figueroa	\$26.57
7/17/2013	subpoena attendance and mileage fee for Nydia Figueroa	\$107.80
7/17/2013	Printed copies of new Defendant Document Production - 4 pages @ .11/pg	\$0.44
7/17/2013	Copies of Exhibits for Trial - 50 pages @ .11/pg	\$5.50
7/18/2013	Copies of Exhibits for Trial: 125 pages @ .11/pg	\$13.75
7/18/2013	2 copies of Defendants' new trial exhibits, 61-77: 230 pages @ .11/pg	\$25.30
7/19/2013	VLH Travel: 60 miles round trip @ .55/mi to courthouse	\$33.00
7/19/2013	FedEx: Binder of Exhibits for Defendants	\$66.78
7/19/2013	TCB Parking @ court house	\$12.50
7/19/2013	Lunch at Trial	\$45.95
7/19/2013	VLH Parking @ Courthouse	\$12.50
7/19/2013	JLC Parking @ Courthouse	\$12.50
7/19/2013	Trial: Fee for daily overnight transcripts	\$4,400.00
7/19/2013	TCB Travel: 36 miles roundtrip @ .55/mi to courthouse	\$19.80
7/19/2013	JLC Travel: 30 miles round trip @ .55/mi to courthouse	\$16.50
7/20/2013	Copies of Exhibits for Trial 150 @ .11/page	\$11.00
7/21/2013	VLH Travel: 30 miles @ .55/mi to courthouse	\$16.50
7/21/2013	Trial - Meal	\$12.26
7/22/2013	JLC travel round trip to courthouse 30 mi @ .55/mile	\$16.50
7/22/2013	TCB Travel: 36 miles roundtrip @ .55/mi to courthouse	\$19.80
7/22/2013	TCB Parking @ court house	\$18.00
7/22/2013	Trial - Lunch	\$43.20
7/22/2013	Trial - Dinner	\$113.32
7/22/2013	FedEx Philadelphia - printing costs	\$46.44
7/22/2013	JLC Parking @ Courthouse	\$18.00
7/23/2013	Trial - Lunch	\$47.95
7/23/2013	JLC travel round trip to courthouse 30 mi @ .55/mile	\$16.50
7/23/2013	TCB Travel: 36 miles roundtrip @ .55/mi to courthouse	\$19.80
7/23/2013	AEH: Meal - courthouse snackshop	\$6.50
7/23/2013	JLC Parking @ Courthouse	\$12.50
7/23/2013	TCB Parking @ Courthouse	\$12.50
7/24/2013	Meal	\$58.24
7/24/2013	Trial: Dinner	\$147.92
7/24/2013	FedEx: Printed Transcript	\$60.08
7/24/2013	JLC travel round trip to courthouse 30 mi @ .55/mile	\$16.50

7/24/2013	TCB Travel: 18 miles @ .55/mi to courthouse	\$9.90
7/24/2013	Trial: JLC Meal	\$6.84
7/24/2013	Trial - TCB Meal	\$3.33
7/24/2013	Hotel Monaco - Stay During Trial	\$502.44
7/24/2013	Meal	\$1.89
7/24/2013	Meal	\$9.71
7/25/2013	Trial - Lunch	\$67.69
7/25/2013	JLC Parking @ court house	\$18.00
7/25/2013	JLC travel round trip to courthouse 30 mi @ .55/mile	\$16.50
7/25/2013	TCB Travel: 18 miles @ .55/mi home from courthouse	\$9.90
7/25/2013	VLH Travel: 30 miles round trip @ .55/mi home from courthouse	\$16.50
7/25/2013	AEH: Beverages @ trial	\$5.00
7/25/2013	TCB Parking @ court house (7/24-7/25)	\$36.00
7/26/2013	Hotel Monaco - Stay for Trial	\$1,735.29
8/28/2013	transcript fee for last day of trial and overage for prior days	\$696.30
SUBTOTAL:		\$16,490.13

**Matter Ledgers**

9/26/2013	Balance before last invoice	\$0.00
9/26/2013	Invoice 10522	\$438,536.13
SUBTOTAL:		\$438,536.13

**Trust Account**

Available in Trust:	\$0.00
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TOTAL: \$438,536.13

PREVIOUS BALANCE DUE: \$0.00

CURRENT BALANCE DUE AND OWING: \$438,536.13

**HARDWICK COLLIER, LLC**

**BY: VIRGINIA HARDWICK, ESQ. (Attorney I.D. No. 202649)**

**TIFFANIE C. BENFER, ESQ. (Attorney I.D. No. 202096)**

179 North Broad Street

Doylestown, PA. 18901

Attorneys for Plaintiff

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**JULIE DIAZ**

49 E. Saucon Street,  
Hellertown, PA 18055

Plaintiff,

v.

**SAUCON VALLEY MANOR, INC.**

1177 6<sup>th</sup> Street  
Whitehall, PA 18052

and

**NIMITA KAPOORATIYEH**

**A/K/A NEMITA ATIYEH**

**A/K/A NEMO AIYAH**

1177 6<sup>th</sup> Street  
Whitehall, PA 18052

Defendants.

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No. 12-cv-00433

Jury Trial Demanded

**CERTIFICATION OF SERVICE**

I, VIRGINIA L. HARDWICK, ESQ., attorney for Plaintiff Julie Diaz hereby  
certify that a true and correct copy of Plaintiff's Supplemental Verification of Virginia L.  
Hardwick in Support of Plaintiff's Petition for Attorneys' Fees and Costs, was sent via  
Electronic Case Filing and electronic mail to the following:

Alan S. Fellheimer, Esquire  
Victoria Hooper, Esquire  
Fellheimer & Eichen, LLP  
Two Liberty Place  
50 South 16<sup>th</sup> Street, 34<sup>th</sup> Floor  
Philadelphia, PA 19102

Date: September 27, 2013

BY: /s/Virginia L. Hardwick, Esquire  
**VIRGINIA L. HARDWICK, ESQ.**  
Attorney for Plaintiff